

REMARKS

Reconsideration of the present application as amended is respectfully requested. Claims 1, 10, and 19 have been amended. Support for the amendments to claims 1, 10, and 19 can be found at at least page 11, line 20 to page 12, line 18 of the application as originally filed. Claims 1-26 are currently pending.

Claims 1, 2, 7, 8, 10, 11, 16, 17, 19, 20, 21, and 26 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,630,925 to Ostergard et al. ("Ostergard"). Ostergard describes a double-sided keyboard having first and second keymats located on two sides of a circuit board. Ostergard further describes that the first and second keymats share an activation mat located between the first keymat and the circuit board. In column 4, lines 48-56 and Fig. 1a, Ostergard describes a communication device having first keys 12 and second keys 22 located on different sides of a cover. Ostergard further describes that when the cover is closed the first keymat is used to enter information, and when the cover is open the second keymat is used.

Independent claim 1 has been amended to include the features of "assigning, by a control unit, a first set of functions to be represented by the keys when the cover lid is detected in the first position", "assigning, by the control unit, a second set of functions to be represented by the keys when the cover lid is detected in the second position", and "wherein the first set of functions and the second set of functions are stored in a key table within a memory." Applicant respectfully submits that Ostergard fails to teach or suggest at least these features of independent claim 1. In particular, Applicant respectfully submits that Ostergard fails to teach or suggest a control unit for assigning a first set of function to be represented by keys of a keypad when a cover lid is detected in a first position, and assigning a second set of functions to be represented by the keys when the cover lid is detected in a second position. Applicant respectfully submits that Ostergard further fails to teach or suggest a key table within a memory for storing the first set of functions and the second set of functions. Applicant respectfully submits that independent claim 1 distinguishes over Ostergard and requests that the 35 U.S.C. 102(e) rejection of independent claim 1 be withdrawn.

Independent claim 10 as amended includes the features of "a memory unit configured to store a first set of functions and a second set of functions to be represented by the keys in a key table" and "a control unit connected to the memory unit and the detector unit, the control unit configured to assign the first set of functions to the keys when the cover lid is detected in the first position, and to assign the second set of functions to the keys when the cover lid is detected in the second position." For similar reasons as those discussed with respect to independent claim 1, Applicant respectfully submits that Ostergard fails to teach or suggest at least these features of independent claim 10. Applicant respectfully submits that independent claim 10 distinguishes over Ostergard and requests that the 35 U.S.C. 102(e) rejection of independent claim 10 be withdrawn.

Independent claim 19 has been amended to include the features of "wherein the keypad is adapted to be connected to the mobile device, the mobile device comprising: a memory unit configured to store the first set of functions and the second set of in a key table, and a control unit connected to the memory unit, the control unit configured to assign the first set of functions to the plurality of mechanical keys when the predetermined event has not occurred, and to assign the second set of functions to the plurality of mechanical keys when the predetermined event has occurred." For similar reasons as those discussed with respect to independent claim 1, Applicant respectfully submits that Ostergard fails to teach or suggest at least these features of independent claim 19. Applicant respectfully submits that independent claim 19 distinguishes over Ostergard and requests that the 35 U.S.C. 102(e) rejection of independent claim 19 be withdrawn.

Claims 2, 7, 8, 11, 16, 17, 20, 21, and 26 are dependent upon and include the features of their respective independent claims 1, 10, and 19. For at least the reasons as discussed with respect to independent claims 1, 10, and 19, Applicant respectfully submits that claims 2, 7, 8, 11, 16, 17, 20, 21, and 26 also distinguish over Ostergard and requests that the 35 U.S.C. 102(e) rejection of claims 2, 7, 8, 11, 16, 17, 20, 21, and 26 be withdrawn.

Claims 1, 4, 10, and 13 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,715,524 to Jambhekar et al. ("Jambhekar"). Jambhekar describes a radio communication device having a touch screen display. Jambhekar describes that in a closed position, the radio communication device has a first set of limited radiotelephone functions. In

an open position, the radio communication device is described as having a different set of functions which include radiotelephone functions, advanced telephone functions, and messaging functions. Jambhekar further describes the use of a switch to determine the open and closed positions.

Regarding independent claim 1, Applicant respectfully submits that Jambhekar fails to teach or suggest at least the feature of independent claim 1 of "wherein the first set of functions and the second set of functions are stored in a key table within a memory." Applicant respectfully submits that Jambhekar contains no teaching or suggestion of a key table within a memory for storing a first set of functions and a second set of functions. Applicant respectfully submits that independent claim 1 distinguishes over Jambhekar and requests that the 35 U.S.C. 102(b) rejection of independent claim 1 be withdrawn.

Regarding independent claim 10, Applicant respectfully submits that Jambhekar fails to teach or suggest at least of independent claim 10 of "a memory unit configured to store a first set of functions and a second set of functions to be represented by the keys in a key table." For similar reasons as those discussed with respect to independent claim 1, Applicant respectfully submits that independent claim 10 distinguishes over Jambhekar and requests that the 35 U.S.C. 102(b) rejection of independent claim 10 be withdrawn.

Regarding independent claim 19, Applicant respectfully submits that Jambhekar fails to teach or suggest at least the feature of independent claim 19 of "a memory unit configured to store the first set of functions and the second set of in a key table." For similar reasons as those discussed with respect to independent claim 19, Applicant respectfully submits that independent claim 19 distinguishes over Jambhekar.

Claims 3, 5, 6, 12, 14, 15, and 22-25 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Ostergard in view of U.S. Patent No. 6,038,313 to Collins ("Collins"). Collins describes a portable telephone having a hinged flap with a keyboard on each side of the flap, allowing a user to dial or punch in a telephone number when the flap is in an open position or a closed position. Claims 3, 5, 6, 12, 14, 15, and 22-25 are dependent upon and include the features of their respective independent claims 1, 10, and 19. As described with respect to independent claims 1, 10, and 19, Ostergard fails to teach or suggest the aforementioned features

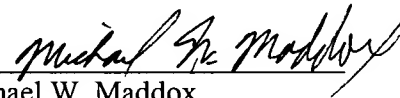
of these claims. Applicant respectfully submits that Collins also fails to teach or suggest these aforementioned features. Applicant respectfully submits that claims 3, 5, 6, 12, 14, 15, and 22-25 distinguish over Ostergard in view of Collins and requests that the 35 U.S.C. 103(a) rejection of claims 3, 5, 6, 12, 14, 15, and 22-25 be withdrawn.

Claims 9 and 18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Ostergard in view of U.S. Patent No. 5,987,310 to Gray ("Gray"). Gray describes a cellular phone in the form of a glove with a cellular phone incorporated therein. Column 3, lines 7-8 of Gray describes that the cellular phone may have a braille keypad. Claims 9 and 18 are dependent upon and include the features of independent claims 1 and 10, respectively. As described with respect to independent claims 1, 10, and 19, Ostergard fails to teach or suggest the aforementioned features of these claims. Applicant respectfully submits that Gray also fails to teach or suggest these aforementioned features. Applicant respectfully submits that claims 9 and 18 distinguish over Ostergard in view of Gray and requests that the 35 U.S.C. 103(a) rejection of dependent claims 9 and 18 be withdrawn.

In view of the above amendments and remarks, Applicant respectfully submits that the pending application is in condition for allowance.

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Respectfully submitted,

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